FILED
04-23-07
02:30 PM

BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Into Implementation of Federal Communications Commission Report and Order 04-87, As It Affects The Universal Lifeline Telephone Service Program	Rulemaking 04-12-001

VERIZON CALIFORNIA INC. (U 1002 C) OPENING COMMENTS ON DECISION ADOPTING STRATEGIES TO IMPROVE THE CALIFORNIA LIFELINE CERTIFICATION AND VERIFICATION PROCESSES, AND REINSTATING PORTIONS OF GENERAL ORDER 153

ELAINE M. DUNCAN
JESÚS G. ROMÁN
112 Lakeview Canyon Road,
CA501LB
Thousand Oaks, CA 91362
Tel: (805) 372-6233
Fax: (805) 373-7515
jesus.g.roman@verizon.com

Attorneys for Verizon California Inc.

April 23, 2007

TABLE OF CONTENTS

INTRODUCTION

Verizon commends the speedy attention the Assigned Commissioner, the Commission, and the parties have paid to these very important Lifeline issues. Verizon remains committed to working with the Commission to ensure the impact on Lifeline customers of transitioning program administration to the Certifying Agent (CertA) is minimized.

The Proposed Decision adopts most of Staff's recommendations in the Staff Report[1] and while these will serve to alleviate identified problems in the short term, they also risk creating other problems. For example, Staff recommends increasing the amount of time to return certifications. But that additional time can create a hardship on low-income customers who are denied Lifeline and backbilled amounts that can exceed $100 in discounts for which the customer was not eligible. This problem only occurs because the California Lifeline program provisionally qualifies customers upon initiating service and then requires carriers to regrade and back bill ineligible customers.

The solution to this problem (and others as discussed below) is to move to a pre-qualification system. Under pre-qualification, a customer is given Lifeline discounts after qualification, with credits applied for the period of time between qualification and initiation of service. Verizon supports a prequalification system and urges the Commission to adopt it as soon as possible.

The particularly pernicious problem of unmatched data (between carriers and the CertA), which causes the CertA to incorrectly reject certifications, is not

[1] *Report on Strategies to Improve the California Lifeline Certification and Verification Processes*, prepared by the Staff of the Communications Division (rel. April 2, 2007) ("Staff Report").

adequately addressed in the Proposed Decision. The Proposed Decision suggests (but does not mandate) one true-up of data between carriers and the CertA. As explained in detail below, the Commission should mandate quarterly true-ups because many of the problems customers experience are due to the CertA not having data that matches that of carriers. Requiring the CertA to match its data to that of carriers will minimize the number of customers incorrectly rejected from Lifeline.

The Proposed Decision adopts nearly all of Staff's recommendations and its report. But the Commission should instruct the Communications Division (CD) to correct two areas in the Staff Report because they are either incorrect or inadvertently misleading. First, Staff reports that all carriers are in noncompliance with General Order 153 because they are charging improper conversion fees upon regrading Lifeline customers. But Verizon has not charged improper fees, thus the report should be corrected accordingly. Second, the Staff Report asserts that Staff has directed carriers to closely monitor the CertA to ensure that it properly processes certifications and verifications. But Verizon has no record of receiving that directive; and even if Staff did or does issue the directive, it is unrealistic. For the reasons explained below, this directive is impractical and should be removed.

DISCUSSION

I. THE COMMISSION SHOULD ABANDON THE CURRENT SYSTEM IN FAVOR OF ONE WHERE CUSTOMERS ARE PRE-QUALIFIED PRIOR TO RECEIVING LIFELINE DISCOUNTS

As the Staff Report[2] recognizes, it has been a long-standing practice that California Lifeline customers receive the discounted phone rate when they originally enroll in the program. In the past, this practice did not present any hardship to Lifeline customers as they self-certified their eligibility. Since the certification process has changed and customers are now required to prove income eligibility, customers who are rejected from the Lifeline program are required to repay the discounted rates, a higher connection fee, and other federal and state taxes and surcharges. If the process of rejection has taken several months, as is often the case, customers may be backbilled substantially more than $100.00.[3]

Commission Staff reports that many applicants who are ultimately deemed ineligible for Lifeline discounts only marginally exceed Lifeline income thresholds.[4] Thus, they are likely to face significant burden as a result of backbilling. Both carriers and the Commission's Consumer Affairs Branch (CAB)

---

[2] Staff Report at 32.

[3] Under Verizon California Inc. Schedule Cal. P.U.C. No. D&R Rule No. 10(J), Verizon may backbill up to three months: "a bill shall not include any previously unbilled charge, commonly called 'backbilling', for service furnished prior to three months immediately preceding the date of the bill." In addition, General Order 153, Section 5.4.4 requires carriers to collect discounted amounts from customers ineligible for Lifeline service: "Any customer who fails to qualify for ULTS by the certification date shall be removed from the ULTS program and converted to regular service. Upon notification from the CertA, the utility shall bill the customer for all ULTS discounts received by the customer, including all previously waived or discounted charges, service initiation charges, end user common line charges, taxes, and surcharges associated with ULTS discounts."

[4] *Id*. at 32.

have received many complaints from customers indicating that this burden is indeed a concern.

This hardship problem will only be exacerbated by the Proposed Decision's suggested change to give customers more notices and time related to certifications (discussed below). These problems can be largely eliminated by adopting a customer pre-qualification system. Under this pre-qualification system, the Commission would not grant the discounted rates when new customers originally apply for Lifeline. Instead, the customer is charged the full residential rate and once the customer's eligibility in the program is certified, she is then placed on the Lifeline program and given a credit for the difference between the full residential rate and the Lifeline rate. Other states follow the prequalification system.[5]

Another advantage of the prequalification system is that customers are encouraged to avoid delays in submitting certification documents in order to receive the Lifeline discounts expeditiously. Thus, customer-caused delays in processing Lifeline applications are likely to diminish.

Under the prequalification system, some customers may find the initial costs to be an obstacle to enrollment. But they can avail themselves of a three-month installment payment plan for connection fees, as provided for in Verizon Tariff Rule 10, Section I.

---

[5] *See* Staff Report at 45 (noting that in the State of Washington all Lifeline recipients are pre-qualified (i.e., income eligibility is verified prior to program enrollment). Hence, no modifications to the program were necessary to comport with the recent federal changes.)

II. THE COMMISSION SHOULD BE CAREFUL TO AVOID THE INCREASED INQUIRIES AND COMPLAINTS CAUSED BY ADDITIONAL TIME TO RETURN CERTIFICATIONS

The Proposed Decision recommends taking the following actions with regard to certification form return and review:

- Delay customer reminder from CertA to return forms by seven days to offset mailing delays;
- Increase the timeframe for new customers to return certification forms from 30 to 44 days;
- Add an eight-day grace period for the late receipt of certification forms.

While these actions will provide new customers additional time to return certification forms, they will have significant downsides for those customers who are found to be ineligible for Lifeline service. Those found ineligible will face backbilling for a significantly longer period of time and will face large billing regrades. Because more than 50% of new Verizon customers are either not returning a certification form or are found ineligible upon submitting one, a significant number of customers will experience larger than expected bills as carriers charge for previous Lifeline related discounts that the customer should not have received.

This will increase customer call volume and duration, as well as inquiries and/or written appeals to Verizon and CAB. Indeed, prior to the July 2006 changes in certification, most inquiries and complaints from Lifeline customers related to backbilling for those found ineligible. Prior to July 2006, approximately 30% of new Lifeline customers were ineligible for Lifeline. With the marked increase in customers ineligible for Lifeline after July 2006, the problem will already compound itself without lengthening the time for customers to return certification forms or adding the grace period.

As discussed above, these additional notices and the problems they create can be avoided by adopting a prequalification system.

III. THE COMMISSION SHOULD REQUIRE QUARTERLY TRUE-UPS BETWEEN CARRIERS AND SOLIX

The Staff Report suggests that carriers and Solix perform only one true-up of their databases to ensure that they are in synch; i.e., that they have the same customer information. Verizon urges the Commission to order additional and frequent true-ups, at least once quarterly. Synched databases are crucial to the smooth running of the Lifeline program and Verizon fears that less frequent true-ups will cause significant errors, thereby resulting in increased complaints and additional preoccupation with the integrity of the data.

As Verizon's early experience with Solix illustrates, synchronization of customer data is critical. Since implementation, processing issues have resulted in inconsistencies in the customer data resident in Verizon and Solix's separate data systems. This has resulted in Solix incorrectly rejecting certifications when processed. If the verification process goes forward without a sync-up the situation will become worse. Following are a few examples of why data true-ups should be required frequently:

- Solix has incorrectly sent reinstatement records to Verizon on accounts for which Verizon had previously sent Solix a disconnect record. These records should not have been sent to Verizon for reinstatement because the customer is no longer a customer of Verizon. In the Solix database these customers still appear to be Verizon Lifeline customers.

- Verizon has discovered Solix is not using customer “disconnect dates” Verizon provided to Solix, but rather Solix is using the “file processing” date in its place. Solix performs no date check to determine if other activity has taken place on the account. This situation was discovered when processing customers who were signing up for Lifeline service for the second time and had already returned their forms. During the time that the customer forms were being processed, Solix received the correcting files from Verizon and processed them using the file processing date, not the customer activity dates provided. This resulted in the immediate re-categorization of the customer to "inactive" status even though the termination record was for prior activity.

- Verizon received a call from a concerned customer who had not received a form. That customer had changed her phone number from the daughter’s name to the mother’s and the mother expected to receive a form. (The phone number and address were unchanged.) When Verizon sent the customer record to Solix it was rejected as the result of outdated information in the Solix system.

Verizon is currently receiving between 130 and 589 rejected records from Solix per day for various reasons related to Solix’s failure to synchronize its data against Verizon’s data; *e.g.,* customer not found in update, customer already exists, number already active. Verizon anticipates that the number of rejected customers will drastically increase when verification accounts are added to the process as currently only certification customers are reflected in the error reports.

Ongoing review and comparison of carrier and Solix data is critical to alleviate this problem going forward. But the synchronization process must flow from the carrier to Solix and not the other way around. In other words, Solix must ensure that it modifies its records to match those of carriers. After unilaterally changing the processing protocols from those initially agreed upon and causing the rejection of valid update records, Solix now recommends that it provide each carrier with a download of Solix’s customer database for each carrier. But that would worsen the current situation. The following experience illustrates why:

- During the re-instatement process, Solix provided records to each carrier adding accounts back onto Lifeline service that had been previously removed. Some of the accounts had already changed carriers and were no longer being provided service by the original carrier. In some instances phone numbers of the former Lifeline customers were reissued to new customers. Since the Solix records still showed the phone number as an active Lifeline account, the new customers were rejected by Solix. The carriers are unable to create a termination record on the original account because the impacted customers are no longer customers of the carrier.

- There are instances where the account provided by Solix for reinstatement contained "old" incorrect billing address information. This resulted in customers being mailed forms to the wrong address upon implementation of the verification process. Carriers have the correct information and can provide this information so that Solix can compare and correct customer records as needed.

For these reasons, Verizon requests that the Commission order Solix to synchronize its data against that of carriers on a quarterly basis.

IV. THE COMMISSION SHOULD DIRECT THE COMMUNICATIONS DIVISION TO MAKE TWO MODIFICATIONS TO THE STAFF REPORT

There are two points in the Staff Report that need correction because they are incorrect or misleading. For the reasons stated below, Verizon requests that the Commission instruct the Communications Division to modify the Staff Report or that it reject the Staff Report as to these points.[6]

First, the Staff Report suggests that all carriers are not complying with Section 5.4.4 of General Order 153 because they are improperly charging Lifeline customers a conversion or regrade fee when regrading Lifeline customers.[7] Staff's factual assertion is incorrect as to Verizon. Verizon does not charge an improper conversion or regrade fee for customers denied LifeLine and

---

[6] On April 23, 2007, Verizon sent a letter to the Director of the Communications Division requesting these corrections.

[7] *See* Staff Report at 13 ("Further, customers who applied for the Lifeline discount but were rejected were being charged a conversion/regrade charge by carriers when they are placed back onto a non-Lifeline residential service rate.")

is not in violation of Section 5.4.4. Instead, when a customer is found to be ineligible for Lifeline, Verizon requires the customer to repay the discounted rates, the original non-Lifeline connection fee, and other federal and state taxes and surcharges. When initiating service of a new Verizon Lifeline customer, Verizon assesses a $10 connection fee; that fee represents a Lifeline discount from the regular $46 connection fee. When a customer is found not eligible for Lifeline, Verizon backbills that customer $36, the difference from the regular connection fee and the discounted fee the Lifeline customer already paid. If the customer already exists with Verizon, but is new to Lifeline, a $10 conversion/regrade fee is charged and basic rates are discounted. This fee is credited back if the customer is found not eligible for Lifeline, and the customer is backbilled for any discounts received, therefore making the customer whole. Verizon has not charged customers found ineligible for Lifeline an improper conversion or regrade fee and the Staff Report is therefore inadvertently misleading in this respect.

Verizon therefore urges correction of the Staff Report to ensure that Verizon is not incorrectly found to be in noncompliance with Section 5.4.4.

Second, the Staff Report states that Staff has directed carriers to "closely monitor their Lifeline applicants and make sure they hear back from Solix in a timely manner."[8] Staff purportedly issued this directive because Solix had failed

[8] Staff Report at 25-26.

to mail application forms to Lifeline customers to initiate the certification or verification processes.[9]

Verizon is unaware of any such directive and has reviewed its notes of meetings with Staff and found no record of the directive. But regardless of whether such a directive was ever given, it is unrealistic. Carriers cannot closely monitor either Solix or a customer to make sure that: (a) Solix sends forms to the customer or (b) that the customer returns an application or (c) that Solix has properly begun to process an application that is timely returned. Carriers do not have access to such detailed information as when Solix sends an application or whether a customer receives the application. And carriers do not know when a customer has returned a completed application to Solix, when Solix received the application, or whether Solix correctly processed an application. Nor do carriers know whether Solix sent an application back to a customer for correction.

Simply put, such a directive is neither reasonable nor realistic. Verizon therefore urges deletion of any reference to this so-called directive.

V. THE COMMISSION SHOULD INCLUDE A 90-DAY IMPLEMENTATION PERIOD FOR PROVIDING ADDITIONAL NOTICE IN CONFIRMATION LETTERS

The Proposed Decision adopts Staff's recommendation to amend General Order 153 Section 4.1 to require carriers to include a notice with confirmation letters sent to new customers that the customer will receive a Lifeline certification form in a "PINK" envelope from Solix. Verizon will face several practical limitations that will require at least 90 days to address. First, the notice requires

9 *Id*. at 25.

that the word “pink” be somehow emphasized. Our current confirmation notification letter (CNL) system does not allow for any color printing or for a particular word to be emphasized in bolding, underlining or capital letters. Instead, an entire sentence can be emphasized using these methodologies (except color). Thus, Verizon would have to find a work around, which would require a reasonable implementation period of at least 90 days. The work around Verizon is evaluating is creating a static image of the notice Staff prepares, that can be added as a separate page to CNLs.[10]

Second, because General Order 153, Section 4.6 requires notices to Lifeline customers in-language, these notices will have to be sent in Spanish and Asian languages. Verizon’s CNL computer system does not support Asian language characters, so even if the Commission were to remove the emphasis on the word “pink,” Verizon would still have to create the static image workaround for customers who prefer to do business in Asian languages.

Verizon is not opposed to sending this notice. It only requests a reasonable implementation period of at least 90 days to test and implement a workaround.

---

[10] The disadvantages of this workaround are several: First, it is expensive. Second, because it is a static image, our CNL computer system cannot show the image on screen. Thus, if the Commission were to ask for a copy of a particular confirmation letter, the CNL system could re-print the confirmation letter but it would not have the image of the notice. If the notice was the element at issue, then Verizon could not be helpful at that point, other than to provide a static copy of the notice it prepared for everyone. By way of further explanation of Verizon’s process, a static copy of the notice is provided to the printer, who adds the notice to CNLs when it receives a code to do so. Verizon thus only creates a standard notice that the printer adds to Verizon’s confirmation letters.

CONCLUSION

For the foregoing reasons, the Commission should (i) adopt a pre-qualification system, (ii) order quarterly true-ups, (iii) instruct the Communications Division to correct the Staff Report and (iv) provide carriers a reasonable period of at least 90 days to implement sending required notices with its confirmation letters.

Respectfully submitted,

*/s/ Jesus G. Roman*______________

Jesús G. Román
112 Lakeview Canyon Road, CA501LB
Thousand Oaks, CA 91362
Telephone: (805) 372-6233
Facsimile: (805) 373-7515
Email: jesus.g.roman@verizon.com

Dated: April 23, 2007

CERTIFICATE OF SERVICE

I hereby certify that: I am over the age of eighteen years and not a party to the within entitled action; my business address is 112 Lakeview Canyon Road, CA501LB, Thousand Oaks, California 91362; I have this day served a copy of the foregoing, **VERIZON CALIFORNIA INC. (U 1002 C) OPENING COMMENTS ON DECISION ADOPTING STRATEGIES TO IMPROVE THE CALIFORNIA LIFELINE CERTIFICATION AND VERIFICATION PROCESSES, AND REINSTATING PORTIONS OF GENERAL ORDER 153** by electronic mail to those who have provided an e-mail address and by U.S. Mail to those who have not, on the service list.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23rd day of April, 2007 at Thousand Oaks, California.

*/s/ Jacque Lopez*_________
Jacque Lopez

Service List: R.04-12-001

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: R0412001 - CPUC-ILECS, CLECS -
Filer: CPUC - ILECS, CLECS
List Name: INITIAL LIST
Last changed: April 19, 2007

Download the Comma-delimited File
About Comma-delimited Files

Back to Service Lists Index

Appearance

JEFF SCHNUR
SOLIX INC.
PO BOX 902
100 S. JEFFERSON ROAD
WHIPPANY, NJ 07981

KIMBERLY KRETCHMER
CITIZENS TELECOM COS OF CA/GS/TU
180 S. CLINTON AVENUE
ROCHESTER, NY 14646-0400

ROSS A. BUNTROCK
WOMBLE CARLYLE SANDRIDGE & RICE PLLC
1401 EYE STREET, N.W. SEVENTH FLOOR
WASHINGTON, DC 20005

OLIVIA B. WEIN
ATTORNEY AT LAW
NATIONAL CONSUMER LAW CENTER
1001 CONNECTICUT AVE., NW., STE. 510
WASHINGTON, DC 20036

SEAN WILSON
TALK.COM
12020 SUNRISE VALLEY, STE.250
RESTON, VA 20191

SHARON THOMAS
TECHNOLOGIES MANAGEMENT, INC.
210 N. PARK AVE.
WINTER PARK, FL 32789

ERIN DAWLEY
HORNITOS TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

PETER GLASS
SEREN INNOVATIONS, INC.
15 SOUTH 5TH STREET, STE 500
MINNEAPOLIS, MN 55402

KARL ANDREW
REGULATORY AFFAIRS
SAGE TELECOM, INC.

MICHAEL MORCOM
VERIZON SELECT SERVICES, INC.
600 HIDDEN RIDGE, HQE01J016

805 CENTRAL EXPRESSWAY SO, STE 100
ALLEN, TX 75013-2789

IRVING, TX 75038

KAREN BAILEY
VERIZON WEST COAST
VERIZON CALIFORNIA, INC.
HQE01G69
600 HIDDEN RIDGE DR., E01E55
IRVING, TX 75038-2092

KRISTIE FLIPPO
TIME WARNER CONNECT
2805 DALLAS PKWY STE 140
PLANO, TX 75093-8720

MARY PHARO
VAR TEC TELECOM, INC.
1600 VICEROY DRIVE
DALLAS, TX 75235

DAVID MORIARTY
MEDIA ONE/AT&T BROADBAND
550 CONTINENTAL BLVD.
EL SEGUNDO, CA 90245

JEFF COMPTON
VICE RESIDENT CARRIER RELATIONS
TELSCAPE COMMUNICATIONS INC.
606 EAST HUNTINGTON DRIVE
MONROVIA, CA 91016

DON EACHUS
VERIZON CALIFORNIA, INC.
CA501LB
112 S. LAKE LINDERO CANYON ROAD
THOUSAND OAKS, CA 91362

JACQUE LOPEZ
LEGAL ASSISTANT
VERIZON CALIFORNIA INC
CA501LB
112 LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

JESUS G. ROMAN
ATTORNEY AT LAW
VERIZON CALIFORNIA, INC.
112 S. LAKEVIEW CANYON ROAD, CA501LB
THOUSAND OAKS, CA 91362

LORRAINE A. KOCEN
VERIZON CALIFORNIA INC.
112 S. LAKEVIEW CANYON ROAD
THOUSAND OAKS, CA 91362

W. LEE BIDDLE
ATTORNEY AT LAW
FERRIS & BRITTON, P.C.
401 WEST A STREET, SUITE 1600
SAN DIEGO, CA 92101

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

JOY C. YAMAGATA
REGULATORY CASE MANAGER
SEMPRA UTILITIES
8330 CENTURY PARK COURT CP 32 D
SAN DIEGO, CA 92123

DALE DIXON
ATTORNEY AT LAW
VYCERA COMMUNICATIONS, INC.
12750 HIGH BLUFF DRIVE, SUITE 200
SAN DIEGO, CA 92129

THALIA R. GIETZEN
VYCERA COMMUNICATION, INC.
12750 HIGH BLUFF DR., STE.200
SAN DIEGO, CA 92130-2565

BRIAN PLACKIS CHENG
BLUE CASA COMMUNICATIONS
911 OLIVE STREET
SANTA BARBARA, CA 93101

ERIC WOLFE
REGULATORY
DUCOR TELEPHONE COMPANY
PO BOX 42230
BAKERSFIELD, CA 93384-2230

DAVE CLARK
KERMAN TELEPHONE COMPANY
811 S MADERA AVE.
KERMAN, CA 93630

LINDA BURTON
PO BOX 219
OAKHURST, CA 93644

DAN DOUGLAS
THE PONDEROSA TELEPHONE CO.
PO BOX 21
O'NEALS, CA 93645

CHRISTINE MAILLOUX
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

MARGARITA GUTIERREZ
DEPUTY CITY ATTORNEY
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE, RM. 375
SAN FRANCISCO, CA 94102

REGINA COSTA
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

SINDY J. YUN
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4300
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ANNA KAPETANAKOS
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET STREET, ROOM 2024
SAN FRANCISCO, CA 94105

GRETA BANKS
AT&T COMMUNICATIONS OF CALIFORNIA
525 MARKET STREET, 18TH FLOOR, 4
SAN FRANCISCO, CA 94105

LOUIE DE CARLO
COMPLIANCE MANAGER
MCI METRO ACCESS TRANSMISSION SERVICES
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

GLENN STOVER
ATTORNEY AT LAW
STOVER LAW
221 MAIN STREET, SUITE 800
SAN FRANCISCO, CA 94105-1906

DARCY BEAL
ASSOCIATE DIRECTOR
AT&T CALIFORNIA
525 MARKET STREET, 19TH FLOOR, 21
SAN FRANCISCO, CA 94105-2727

PETER M. HAYES
DIRECTOR
AT&T CALIFORNIA

ENRIQUE GALLARDO
LATINO ISSUES FORUM
160 PINE STREET, SUITE 700

525 MARKET STREET, ROOM 1919
SAN FRANCISCO, CA 94105-2727

SAN FRANCISCO, CA 94111

JOHN L. CLARK
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI DAY & LAMPREYLLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

MARK P. SCHREIBER
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

PATRICK M. ROSVALL
ATTORNEY AT LAW
COOPER, WHITE & COOPER, LLP
201 CALIFORNIA STREET, 17TH FLOOR
SAN FRANCISCO, CA 94111

JOHN A. GUTIERREZ
COMCAST
12647 ALCOSTA BOULEVARD, SUITE 200
SAN RAMON, CA 94544

JOSEPHINE WONG
APEX TELECOM INC.
PO BOX 1917
OAKLAND, CA 94604

C. HONG WONG
APEX TELECOM, INC.
113 10TH STREET
OAKLAND, CA 94607

LATANYA LINZIE
COX CALIFORNIA TELCOM, L.L.C.
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608

DOUGLAS GARRETT
VICE PRESIDENT, WESTERN REGION REGULATOR
COX CALIFORNIA TELCOM, LLC, DBA COX COMM
2200 POWELL STREET, SUITE 1035
EMERYVILLE, CA 94608-2618

THALIA N.C. GONZALEZ
LEGAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVE., 2ND FLOOR
BERKELEY, CA 94704

MELISSA W. KASNITZ
DISABILITY RIGHTS ADVOCATES
2001 CENTER STREET, THIRD FLOOR
BERKELEY, CA 94704-1204

LORRIE BERNSTEIN
PINNACLES TELEPHONE COMPANY
340 LIVE OAK ROAD
PAICINES, CA 95043-9998

EDWARD J SCHNEIDER, JR
FORESTHILL TELEPHONE CO., INC.
4655 QUAIL LAKES DR.
STOCKTON, CA 95207

LYNNE MARTIN
PAC-WEST TELECOMM, INC.
1776 MARCH LANE, SUITE 250
STOCKTON, CA 95207

LORRIE BERNSTEIN
MOSS ADAMS LLP
3121 WEST MARCH LANE, STE. 100
STOCKTON, CA 95219-2303

YVONNE SMYTHE
CALAVERAS TELEPHONE COMPANY
PO BOX 37
COPPEROPOLIS, CA 95228

LINDA COOPER
GLOBAL VALLEY NETWORKS, INC.
515 KEYSTONE BLVD.
PATTERSON, CA 95363-8861

ROSE CULLEN
THE VOLCANO TELEPHONE COMPANY
PO BOX 1070
PINE GROVE, CA 95665-1070

LINDA LUPTON
REGULATORY MANAGER
SUREWEST TELEPHONE
PO BOX 969
ROSEVILLE, CA 95678

JOLEEN HOGAN
CAL-ORE TELEPHONE COMPANY
PO BOX 847
DORRIS, CA 96023

JAMES LOWERS
THE SISKIYOU TELEPHONE COMPANY
PO BOX 157
ETNA, CA 96027

GAIL LONG
TELEPHONE COMPANY
HAPPY VALLEY/HORNITOS/WINTERHAVEN
PO BOX 1566
OREGON, OR 97045

Information Only

ADRIENNE M. MERCER
REGULATORY COMPLIANCE ANALYST
SAGE TELECOM, INC.
805 CENTRAL EXPRESSWAY S, STE 100
ALLENT, TX 75013

BETTINA CARDONA
PRESIDENT
FONES4ALL CORPORATION
6320 CANOGA AVE, SUITE 650
WOODLAND HILLS, CA 91367

ESTHER NORTHRUP
COX CALIFORNIA TELCOM
5159 FEDERAL BLVD.
SAN DIEGO, CA 92105

GLENNDA KOUNTZ
REGULATORY ASSISTANT
KERMAN TELEPHONE CO.
811 S. MADERA AVENUE
KERMAN, CA 93630

JULIE WEIGAND
RICHARD HEATH AND ASSOCIATES, INC.
590 W. LOCUST AVENUE, SUITE 103
FRESNO, CA 93650

NELSONYA CAUSBY
ATTORNEY AT LAW
AT&T CALIFORNIA
525 MARKET ST., STE 2025
SAN FRANCISCO, CA 94105

MARGARET L. TOBIAS
ATTORNEY AT LAW
TOBIAS LAW OFFICE
460 PENNSYLVANIA AVENUE
SAN FRANCISCO, CA 94107

SUZANNE TOLLER
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533

LAW DEPARTMENT FILE ROOM
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO, CA 94120-7442

ROBERT GNAIZDA
POLICY DIRECTOR/GENERAL COUNSEL
THE GREENLINING INSTITUTE
1918 UNIVERSITY AVENUE, SECOND FLOOR
BERKELEY, CA 94704

CHARLES E. BORN
MANAGER-STATE GOVERNMENT AFFAIRS
FRONTIER, A CITIZENS TELECOMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

JOE CHICOINE
MANAGER, STATE GOVERNMENT AFFAIRS
FRONTIER COMMUNICATIONS
PO BOX 340
ELK GROVE, CA 95759

State Service

ANGELA YOUNG
CALIF PUBLIC UTILITIES COMMISSION
FISCAL & ADMINISTRATIVE SERVICES
AREA 3-E
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

CHERRIE CONNER
CALIF PUBLIC UTILITIES COMMISSION
PROGRAM MANAGEMENT & IMPLEMENTATION BRAN
AREA 3-D
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

DONNA L. WAGONER
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

HAZLYN FORTUNE
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JESSICA T. HECHT
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 5113
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JOSIE WEBB
CALIF PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN A. DEGANNES
CALIF PUBLIC UTILITIES COMMISSION
ENERGY RESOURCES BRANCH
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

KAREN JONES
CALIF PUBLIC UTILITIES COMMISSION
DIVISION OF ADMINISTRATIVE LAW JUDGES
ROOM 2106
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NATALIE BILLINGSLEY
CALIF PUBLIC UTILITIES COMMISSION
TELECOMMUNICATIONS & CONSUMER ISSUES BRA
ROOM 4108
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

RISA HERNANDEZ
CALIF PUBLIC UTILITIES COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT HAGA
CALIF PUBLIC UTILITIES COMMISSION
EXECUTIVE DIVISION
ROOM 5304
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SEAN WILSON
CALIF PUBLIC UTILITIES COMMISSION
UTILITY AUDIT, FINANCE & COMPLIANCE BRAN
AREA 3-C
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

Top of Page
Back to INDEX OF SERVICE LISTS